

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR CERTIFICATES OF PUBLIC)	
CONVENIENCE AND NECESSITY AND)	CASE NO.
APPROVAL OF ITS 2016 COMPLIANCE PLAN)	2016-00026
FOR RECOVERY BY ENVIRONMENTAL)	
SURCHARGE)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before April 20, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when

made, is now incorrect in any material respect. For any request to which KU fails or refuses to furnish all or part of the requested information, KU shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a document containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Robert M. Conroy, page 6, line 8, and the Direct Testimony of R. Scott Straight, page 5, lines 7–8, both of which discuss Project 37 improvements to the wet flue-gas desulfurization unit (“WFGD”) for Ghent Unit 2. The statements focus on increasing the liquid flow in the WFGD system and mention replacing pump drive gearboxes as an option in accomplishing that result. Provide details concerning the purpose of this replacement, including whether additional pump items will require replacement in conjunction with the gearboxes, and whether other options have been considered to achieve the same or similar purpose. If other options have been considered, identify those options and state how efficient each option is in achieving the purpose.

2. Refer to the Direct Testimony of John N. Voyles (“Voyles Testimony”), page 27, lines 1–7, concerning process water system construction. Explain in detail

whether process water systems are constructed of individually designed components on site, or whether appropriate package systems are available for purchase and installation.

3. Refer to the Voyles Testimony, the Exhibits prepared by CH2M HILL, Inc. Typically, it is stated that the cost estimates for the studies are +30 percent/-30 percent, and include a 30 percent contingency. Confirm that the 30 percent contingency is in the total capital cost before applying the +30 percent/-30 percent high and low factors.

4. Refer to the Voyles Testimony, Exhibit JNV-3, page 12, Section B. Confirm that the elevation dimensions are incorrect, and if so, provide correct elevation dimensions.

5. Refer to KU's response to Staff's Initial Request for Information, Item 15. Provide a more detailed description of the concrete Fabricform protective cover used as a component of the liner system being addressed.

6. Refer to KU's response to Attorney General's Initial Request for Information, Items 6 and 7. The response to Item 7 states that the closure process must be completed in five years. Based on the response to Item 6, if the circumstances are applicable, can extensions to the five-year limit be requested and given?


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Public Service Commission
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DATED APR 08 2016

cc: Parties of Record

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